

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

WILLIAM FUELBERTH, Individually and
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

GODFATHER’S PIZZA, INC.,

Defendant.

Case No. 8:22-cv-00195

SECOND JOINT STATUS REPORT

COME NOW the Plaintiffs William Fuelberth, Anthony Robert Cook, Ethan Bradley Brownell, William E. Donlan, Rebecca Holmes, Sara G. Hovorka, Christian Ramos, Jordan Schnider, Dylan Thomas, Halee Williams, Aaron Lyle Wilson, Noah Daniel Grice, Brad Mathewson, Dylan Araujo, Brian Avalos, Alex Leland Carey, Louis J. Hacker, Ryan Loye, Samuel J. Peterson, Edward Anthony Walbrecht, T’Challa Wayne Berg, Michael Anthony Miller, Tamara Schwid, James Dean Soderholm, Christopher Kollar, Gage Michael Kreeger-Collier, Amber Burbridge, Trenea Starks, Anthony Palazzola, Spencer Jonas, Christian Kjeldgaard, Melissa Spear, Joel Pattie, Guy Robert Brown II, Brandon L. Hopkins, Courtney James Schenk, Todd Taylor, Thomas Nastase, and Andrea Manganaro (collectively, the “Plaintiffs”), and Defendant Godfather’s Pizza, Inc. (“Godfather’s Pizza”), by and through their respective counsel, and submit the following Joint Status Report, in accordance with the Court’s Order entered on July 9, 2024 (*Doc. No. 54*):

1. The parties continue to discuss and work toward the production of certain information and documents for purposes of evaluating whether the parties wish to engage in settlement discussions and/or mediation.

2. On June 7, 2024, following the filing of the parties’ Joint Motion to Stay Proceedings (*Doc. No. 50*), Plaintiff Dylan Araujo served his First Set of Requests for

Production of Documents on Godfather's Pizza. On July 8, 2024, Godfather's Pizza served initial Objections and Responses to Plaintiff Dylan Araujo's First Set of Requests for Production of Documents (*Doc. No. 52*).

3. Counsel for the parties worked together to prepare a Joint Motion for Protective Order governing the disclosure of confidential discovery material, and filed the same for the Court's consideration on July 29, 2024. (*Doc. No. 55*).

4. On July 29, 2024, the Court entered the Protective Order. (*Doc. No. 56*).

5. Given the voluminous number of documents requested through the First Set of Requests for Production of Documents, full document production remains ongoing and is expected to be completed on or before August 16, 2024.

6. Godfather's Pizza also plans to serve its own discovery requests on Plaintiffs in the weeks to come.

7. The parties are in agreement that the stay should continue.

Dated this 7th day of August, 2024.

Jointly submitted by:

WILLIAM FUELBERTH, ANTHONY ROBERT COOK,
ETHAN BRADLEY BROWNELL, WILLIAM E. DONLAN,
REBECCA HOLMES, SARA G. HOVORKA, CHRISTIAN
RAMOS, JORDAN SCHNIDER, DYLAN THOMAS,
HALEE WILLIAMS, AARON LYLE WILSON, NOAH
DANIEL GRICE, BRAD MATHEWSON, DYLAN
ARAUJO, BRIAN AVALOS, ALEX LELAND CAREY,
LOUIS J. HACKER, RYAN LOYE, SAMUEL J.
PETERSON, EDWARD ANTHONY WALBRECHT,
T'CHALLA WAYNE BERG, MICHAEL ANTHONY
MILLER, TAMARA SCHWID, JAMES DEAN
SODERHOLM, CHRISTOPHER KOLLAR, GAGE
MICHAEL KREEGER-COLLIER, AMBER
BURBRIDGE, TRENEA STARKS, ANTHONY
PALAZZOLA, SPENCER JONAS, CHRISTIAN
KJELDGAARD, MELISSA SPEAR, JOEL PATTIE, GUY
ROBERT BROWN II, BRANDON L. HOPKINS,
COURTNEY JAMES SCHENK, TODD TAYLOR,
THOMAS NASTASE, AND ANDREA MANGANARO,
Plaintiffs

By: /s/ Josh Sanford
Josh Sanford (Ark. Bar No. 2001037)
SANFORD LAW FIRM, PLLC
Kirkpatrick Plaza
10800 Financial Centre Pkwy, Suite 510
Little Rock, Arkansas 72211
Telephone: (800) 615-4946
Facsimile: (888) 787-2040
josh@sanfordlawfirm.com
Attorney for Plaintiffs

- and -

GODFATHER'S PIZZA, INC., Defendant

By: /s/ Tara A. Stingley
Tara A. Stingley (#23243)
Sydney M. Huss (#26581)
CLINE WILLIAMS WRIGHT
JOHNSON & OLDFATHER, L.L.P.
Sterling Ridge
12910 Pierce Street, Suite 200
Omaha, NE 68144
(402) 397-1700
tstingley@clinewilliams.com
shuss@clinewilliams.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

I, Tara A. Stingley, hereby certify that on this 7th day of August, 2024, I electronically filed the foregoing document with the Clerk of the United States District Court for the District of Nebraska using the CM/ECF system, which sent notification of such filing to the following:

Josh Sanford
josh@sanfordlawfirm.com

/s/ Tara A. Stingley